

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)**

IN RE: * **CASE No.:** **08-35653-KRH**

CIRCUIT CITY STORES, INC., *et al.*, * **(CHAPTER 11)**

DEBTORS. * **(JOINTLY ADMINISTERED)**

* * * * *

**JOINDER OF TOSHIBA AMERICA CONSUMER PRODUCTS, L.L.C.
TO MOTION OF APEX DIGITAL, INC. AND THQ, INC. FOR RECONSIDERATION
OF COURT'S ORDER ON DEBTORS' FIFTY-FIRST AND FIFTY-SECOND OMNIBUS OBJECTIONS**

Toshiba America Consumer Products, L.L.C. (“TACP”), by its attorneys, hereby joins in the *Motion of Apex Digital, Inc. and THQ, Inc. for Reconsideration of Court’s Order on Debtors’ Fifty-First and Fifty-Second Omnibus Objections* [Docket No. 6258] (the “Motion for Reconsideration”), requesting that the Court reconsider its *Order on Debtors’ Fifty-First and Fifty-Second Omnibus Objections* and related *Memorandum Opinion*, both entered on January 6, 2010 [Docket Numbers 6228 and 6228-1] (together, the “Order”), and states:

1. TACP timely requested reimbursement of administrative expenses from the debtors and debtors in possession in the above captioned cases (collectively, the “Debtors”)¹ pursuant to 11 U.S.C. § 503(b)(9).

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSSStuff, LLC Jeremy S. Friedberg, VSB No. 40228
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2. TACP hereby joins, adopts, and incorporates the Motion for Reconsideration.
3. Toshiba reserves its rights to supplement this Joinder at any time prior to a final hearing on the Motion for Reconsideration.

WHEREFORE, Toshiba America Consumer Products, L.L.C. respectfully requests that this Court:

- A. Grant the Motion for Reconsideration;
- B. Reconsider its Order;
- C. Overrule the *Debtors' (I) Fifty-second Omnibus Objection to Certain 503(b)(9) Claims and (II) Motion for a Waiver of the Requirement that the First Hearing on Any Response Proceed as a Status Conference* [Docket No. 5216]; and
- D. Provide such other and further relief as the Court determines to be necessary.

/s/ Jeremy S. Friedberg

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(9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of January, 2010, a copy of the foregoing was served *via* first-class mail, postage prepaid, and, if the recipients are properly registered, *via* the Court's CM/ECF system, on:

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